

REMARKS

Applicants are submitting a "Replacement Sheet" for Sheet 2/2 of the formal drawings which has been corrected as requested by the examiner.

Claims 1, 4, and 5 were rejected over Monjure et al ('992). Claim 1 as amended requires that the hose be inserted into the same tubing that contains a string of rods which rotate a pump located at the bottom of the tubing. In '992, the hose is instead lowered into an annulus between strings of casing. Applicants submit that claim 1 and its dependent claims 4 and 5 should thus be allowable as amended.

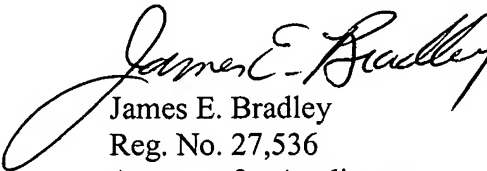
Claims 2 and 8 were rejected over '992 in view of Monjure et al ('239). Regarding claim 2, as outlined above, claim 1 as amended requires that the hose be inserted into the same tubing that contains a string of rods which rotate a pump located at the bottom of the tubing. Both '922 and '239 involve the lowering of a hose into an annulus between strings of casing. It would not have been obvious to one of ordinary skill in the art that such a method could apply to tubing with limited space such as that surrounding a string of rods which rotate a pump.

Claims 6, 7, 9 and 10 are rejected over '992 in view of Neuroth and in view of Freet. Neither Neuroth nor Freet teach a method for removing sand, that utilizes a hose that can be inserted after the well has been completed or a hose runs the entire length of tubing. Neuroth teaches a method of injecting gas into the annulus 38, defined by the inner surface of tubing 14 itself, which gas then escapes through a tube 62 located at the lower end of the tubing for the purpose of enabling the removal of the pump assembly (see col. 3, lines 30-39). Neuroth does not disclose a string of rods inside the tubing and in Neuroth, it would not be possible to run a hose within tube 42 as cable supports 40 would impede the progress of such hose. In addition, Applicants' claims remove debris from within tubing 23 whereas Neuroth teaches a method for

removing sand from annulus 18, not tubing 14. It would not be obvious to one of ordinary skill in the art that the hose could be inserted into the tubing alongside the rods after the pump at the bottom of the tubing had been installed. Applicant submits that claim 6 as amended and its dependent claims 7, 8, and 9, and claim 10 should thus be allowable.

It is respectfully submitted that the claims are now in condition for allowance and favorable action is respectfully requested.

Respectfully submitted,


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